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Attorneys for Plaintiffs
DEMETRIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**DECLARATION OF SABRINA GRISLIS
IN SUPPORT OF PLAINTIFFS' REPLY
IN SUPPORT OF THEIR MOTION FOR
SANCTIONS**

Date: February 19, 2020

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: May 11, 2020

Complaint filed: October 16, 2017

1 I, SABRINA GRISLIS, hereby declare:

2 1. I am a paralegal with the law firm of California Civil Rights Law Group,
3 attorneys of record for Plaintiffs Demetric Di-Az and Owen Diaz in this action. I submit this
4 Declaration in support of Plaintiffs' Motion for Sanctions. I have personal knowledge of the
5 facts stated herein and if called upon to testify, I could and would competently testify thereto,
6 except as to those matters that are stated upon information and belief.
7

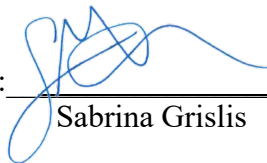
8 2. Attached hereto and marked as **Exhibit 1** is a true and correct copy of the Proof of
9 Service that I received from our process server for service of a deposition subpoena on Ramon
10 Martinez dated October 2, 2019 at 6:55 pm.
11

12 3. On or around October 2, 2019, I received a phone call from someone identifying
13 themselves as Ramon Martinez. He said he just received a deposition subpoena for a Ramon
14 Martinez, but he was the wrong person. He told me that he has never worked for Tesla, Inc. and
15 that there are several people with the name Ramon Martinez in his neighborhood.
16

17 I declare under penalty of perjury under the laws of the United States of America that the
18 foregoing is true and correct. Executed on January 10, 2020 in San Anselmo, California.
19

20 DATED: February 3, 2020

21 By:


Sabrina Grislis